

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

COLLISION COMMUNICATIONS, INC.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 2:21-CV-308-JRG (Lead Case)
NOKIA SOLUTIONS AND NETWORKS OY, and NOKIA OF AMERICA CORPORATION,	§	JURY TRIAL DEMANDED
	§	
Defendants.	§	
	§	
COLLISION COMMUNICATIONS, INC.,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Case No. 2:21-CV-327-JRG (Member Case)
TELEFONAKTIEBOLAGET LM ERICSSON and ERICSSON INC.,	§	JURY TRIAL DEMANDED
	§	
Defendants.	§	
	§	
	§	

JOINT MOTION TO AMEND DOCKET CONTROL ORDER

Plaintiff Collision Communications, Inc. (“Collision”) and Defendants Nokia of America Corporation and Nokia Solutions and Networks Oy (collectively, “Nokia”), and Telefonaktiebolaget LM Ericsson and Ericsson Inc. (collectively, “Ericsson”) (Nokia and Ericsson, collectively, “Defendants”) jointly and respectfully request that the Court amend its July 12, 2022, Docket Control Order (Dkt. 82) as reflected below and in the Amended Docket Control Order attached hereto.

Original Deadline	Amended Deadline	Event
October 14, 2022	October 28, 2022	*Response to Dispositive Motions (including <i>Daubert</i> Motions). Responses to dispositive motions that were filed prior to the dispositive motion deadline, including <i>Daubert</i> Motions, shall be due in accordance with Local Rule CV-7(e), not to exceed the deadline as set forth in this Docket Control Order. ² Motions for Summary Judgment shall comply with Local Rule CV-56.
September 30, 2022	October 14, 2022	<p>*File Motions to Strike Expert Testimony (including <i>Daubert</i> Motions)</p> <p>No motion to strike expert testimony (including a <i>Daubert</i> motion) may be filed after this date without leave of the Court.</p>
September 30, 2022	October 14, 2022	<p>*File Dispositive Motions</p> <p>No dispositive motion may be filed after this date without leave of the Court.</p> <p>Motions shall comply with Local Rule CV-56 and Local Rule CV-7. <u>Motions to extend page limits will only be granted in exceptional circumstances. Exceptional circumstances require more than agreement among the parties.</u></p>
September 26, 2022	October 7, 2022	Deadline to Complete Expert Discovery
September 15, 2022	September 26, 2022	Serve Disclosures for Rebuttal Expert Witnesses
August 24, 2022	August 31, 2022	Serve Disclosures for Expert Witnesses by the Party with the Burden of Proof
August 15, 2022	August 19, 2022 for Nokia, August 26, 2022 for Ericsson and Collision	Deadline to Complete Fact Discovery and File Motions to Compel Discovery

The parties have briefly extended the deadline for completing fact discovery in this case, because the parties still have at least six depositions scheduled for the two weeks after the close of fact discovery and expect to have at least two additional depositions scheduled. Moreover, the parties are still working through a number of other discovery issues and engaging in the meet and confer process. This extension of fact discovery will permit the parties to take necessary discovery and potentially resolve a number of disputes without the Court's intervention.

Good cause exists for the extension of the Motion to Strike and Dispositive Motions deadlines in order to provide the Parties with sufficient time to prepare expert reports and complete expert discovery before filing such motions. This extension will also reduce the likelihood of motions for leave to take discovery out of time or for leave to supplement expert reports. Additionally, good cause exists because members of both Plaintiff and Defendants' team have a trial scheduled for October 3, 2022 in a different matter before your Honor. The requested relief does not change the currently scheduled pretrial conference or the trial in this matter.

Dated: August 15, 2022

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on August 15, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Melissa R. Smith _____

Melissa R. Smith

CERTIFICATE OF CONFERENCE

I hereby certify that counsel for Plaintiff and counsel for Defendants have complied with Local Rule CV-7(h) by conferring, and all parties agree to filing this as a joint motion.

/s/ Melissa R. Smith _____

Melissa R. Smith